

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
ILIR LECAJ,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Civ. Action. No.: 15-10256
GREEN TREE SERVICING LLC	)	
	)	
Defendant.	)	
_____	)	

**DEFENDANT’S EMERGENCY MOTION FOR EXTENSION OF TIME**

Defendant Green Tree Servicing LLC (“Green Tree”) moves on an emergency basis for a one-week extension of time to respond to the Complaint filed by Plaintiff Ilir Lecaj (“Lecaj”). On February 3, 2015, Green Tree removed this action to this Court. As a result, a response to the Complaint was due on February 10, 2015. Since Green Tree removed this action, there has been severe inclement weather in the Boston area causing office closures (including on February 9 and 10, 2015), which has impacted adversely Green Tree’s counsel’s ability to respond to the Complaint timely. As a result, Green Tree requests this Court grant it a brief extension of time until February 17, 2015 to respond to the Complaint.

**WHEREFORE**, Green Tree requests this grant it up to and including February 17, 2015 to file its response to the Complaint.

GREEN TREE SERVICING LLC,

By their attorneys,

/s/ Amy B. Hackett

Richard E. Briansky (BBO# 632709)

Amy B. Hackett (BBO# 676345)

McCarter & English LLP

265 Franklin Street

Boston, MA 02110

Phone: (617) 449-6500

[rbriansky@mmcarter.com](mailto:rbriansky@mmcarter.com)

[ahackett@mccarter.com](mailto:ahackett@mccarter.com)

CERTIFICATE OF SERVICE

I, Amy B. Hackett, certify that on February 11, 2015, I served a copy of the foregoing document on all parties by delivering a copy of the same by first class mail to:

Iir Lecaj  
15 Juniper Street  
Ipswich, MA 01938

/s/ Amy B. Hackett